



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

MAY 30 1991

DMT-SECTION

MAY 30 1991

MEMORANDUM

SUBJECT: Review of Draft PA on Olin Water Services, Kansas City, Kansas

FROM: Diane Huffman *DH*
RCRA Compliance Section

THRU: David Doyle, Chief *David Doyle*
RCRA Compliance Section

TO: Lynn Harrington, Chief
RCRA Permits Section

I have reviewed the EPI Preliminary Assessment on Olin Water Services as requested. Questions and comments on specific items are as follows:

1. Page 2-5, first paragraph, third sentence: "The majority of identified waste stored in the permitted container storage area exhibit characteristics of reactivity, corrosivity, ignitability, and/or EP toxicity as denoted in 40 Code of Federal Regulations (CFR) Subpart C (E & E 1990)." Characteristics of hazardous waste are denoted in 40 CFR, Part 261, Subpart C.
2. Page 4-2, section 4.3, last sentence: Permeability would be more appropriately qualified as low rather than slow.
3. Page 5-1, section 5.1: During the VSI, were there any cracks or gaps observed in the concrete floor of the hazardous waste container storage area?
4. Page 5-5, section 5.2: How often is the waste that accumulates in the sump vat and trench pumped out? Approximately what quantity of waste is being pumped out?
5. Page 5-7, last full sentence on the page: "The VSR sump vat and collection trench is monitored from the inside of the VSR Blending Room (Dame 1990)." How is the sump vat and collection trench being monitored?
6. Page 5-8, section 5.3.1, second paragraph, fourth sentence: "An on/off valve located in the center of the C/F drainage system



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regulates whether the SWMU unit is continuous with the plant's sewer discharge system (Appendix A; Photo 17; Figure 5-1)." "SWMU unit" is redundant.

7. In this report, several of the SWMU's are described as being "not RCRA-regulated". This is not entirely accurate and should be corrected.

8. Page 5-9, section 5.3.1, "Release Controls" paragraph: Have any of the wastes contained in the C/F Blending Room trench been drummed because they did not meet the POTW discharge parameters outlined in Olin's wastewater discharge permit?

9. Page 5-12, "Wastes Managed" paragraph, first sentence: See comment #6.

10. Page 5-10, section 5.4.1, fourth sentence: "Soduim" should be "Sodium".

11. Page 5-10 and 5-11, section 5.4.1: The Sodium Chloride Blending Room and the Powder Blending Room are briefly mentioned in this section. Should these areas be addressed as separate SWMU's?

If you have any questions regarding the above, please contact me at extension 7544.

Attachment

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MAY 30 1991

MEMORANDUM

SUBJECT: Review of Draft PA on Olin Water Services, Kansas
City, Kansas KSD000 203638 *Ashland Chemical*

FROM: Diane Huffman
RCRA Compliance Section

THRU: David Doyle, Chief
RCRA Compliance Section

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RCRA Permits Section

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RCOM RCOM
HUFFMAN DOYLE

DAH
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RCRA Records Center

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